

EXHIBIT A



PROCESS SERVER DELIVERY DETAILS

Date: Wed, Aug 9, 2023
Server Name: Drop Service

Entity Served	EXPERIAN INFORMATION SOLUTIONS INC
Case Number	23-A-06514-6
Jurisdiction	GA

Inserts		





- ☐ Please note that the documents ^(Sheriff's Entry of Service) attached ^{is} are of poor quality and the enclosed scan is of the best quality attainable. If you require improved quality documents, please contact the serving party.

- ☐ Please note that the documents appear to possibly be missing pages, but documents were scanned as received.

Civil Action No. 23-cv-01111

Date Filed _____

Magistrate Court ☐
 Superior Court ☐
 State Court ☐
 Georgia, Gwinnett County

Case No. 23-cv-01111

Attorney's Address _____

Plaintiff

VS.

Case No. 23-cv-01111

Name and Address of party to be served.

Defendant

Plaintiff - [illegible][illegible][illegible]

Garnishee

Sheriff's Entry Of Service

Personal ☐

I have this day served the defendant _____ personally with a copy of the within action and summons.

Notorious ☐

I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.

Delivered same into hands of _____ described as follows
age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches; domiciled at the residence of defendant.Corporation ☒Served the defendant Expedia Information Solutions Inc a corporation
by leaving a copy of the within action and summons with Mr. Richardson
in charge of the office and place of doing business of said Corporation in this County.Tack & Mail ☐

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

Non Est ☐Diligent search made and defendant _____
not to be found in the jurisdiction of this Court.This 9 day of Aug, 2023.Lt. Higgins 50541
Deputy

Sheriff Docket _____ Page _____

Gwinnett County, Georgia

WHITE: Clerk

CANARY: Plaintiff / Attorney

PINK: Defendant

7/30/2023 8:14 PM
TIANA P. GARNER, CLERK

GWINNETT COUNTY SUPERIOR COURT
STATE OF GEORGIA

CHLOE RICHARDSON HAMMED

Plaintiff,

JURY TRIAL DEMANDED

vs.

23-A-06514-6

EXPERIAN INFORMATION SOLUTIONS INC.

Defendant.

SUMMONS

TO THE ABOVE-NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff, whose name and address is:

CHLOE RICHARDSON HAMMED

3695 Cumberland Blvd 2313
Atlanta, Georgia 30339
678-830-6808

an Answer to the Complaint which is herewith served upon you, within 30 days after service of this Summons upon you exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in this Complaint.

31st day of July, 2023

This _____ day of _____
Tiana P. Garner

Clerk of superior Court

By: 

Deputy Clerk

GWINNETT COUNTY SUPERIOR COURT

7/30/2023 8:14 PM
TIANA P. GARNER, CLERK

Amended

GWINNETT COUNTY SUPERIOR
COURT STATE OF GEORGIA

CHLOE RICHARDSON HAMMED

Plaintiff,

JURY TRIAL DEMANDED

23-A-06514-6

vs.

CASE NO

CAMDEN DEVELOPMENT INC

CAMDEN PROPERTY AND TRUST

HUNTER WARFIELD

EXPERIAN INFORMATION -

SOLUTIONS INC

EQUIFAX CREDIT-

INFORMATION SERVICES

TRANSUNION LLC

SAGE GREEN

Defendants.

COMPLAINT FOR DAMAGES

COMES NOW CHLOE RICHARDSON HAMMED Plaintiff in the above-styled action, and brings this Complaint for Damages, and shows the Court the following:

1.

CHLOE RICHARDSON HAMMED is, and at all times material to this action, was a resident of the State of Georgia.

2.

Defendant CAMDEN DEVELOPMENT INC. is subject to the jurisdiction and venue of this Court.

3.

Defendant CAMDEN PROPERTY TRUST is subject to the jurisdiction and venue of this Court.

4.

Defendant EXPERIAN INFORMATION SOLUTIONS is subject to the jurisdiction and venue of this Court.

5.

Defendant Equifax Credit Information Services Inc. is subject to the jurisdiction and venue of this Court.

6.

Defendant Transunion is subject to the jurisdiction and venue of this Court.

7.

Defendant Hunter Warfield is subject to the jurisdiction and venue of this Court.

8.

Defendant Sage Green is subject to the jurisdiction and venue of this Court.

9.

Defendant CAMDEN PROPERTY TRUST is a foreign corporation who is a structured as a Real Estate Investment Trust (REIT); the company is primarily engaged in the ownership, management, development, redevelopment, acquisition, and construction of multifamily apartment communities according to their website. Their Corporate Headquarters is established in the state of Texas. CAMDEN PROPERTY TRUST principle place of business is 11 E Greenway Suite 2400, Houston, TX 77046. CAMDEN PROPERTY TRUST registered agent for service process is Capitol Corporate Services Inc. whose address is 3675 Crestwood Pkwy Suite 350 Duluth, GA 30096.

10.

The Defendant CAMDEN DEVELOPMENT INC is a foreign corporation who according to web sources provides real estate services. The Company offers property management, development, acquisitions, and construction management services. Camden Development operates in the United States. CAMDEN DEVELOPMENT INC. principle business address is 3 E GREENWAY PLZ STE 1300 HOUSTON TX 77046-0391. The registered agent for CAMDEN DEVELOPMENT INC Capitol Corporate Services Inc. whose address is 1501 S MOPAC EXPY STE 220.

AUSTIN, TX, 78746, USA

11.

The Defendant Hunter Warfield AKA Resident Interface is a collections agency primarily collecting residential rent debt. The Defendant Hunter Warfield AKA Resident Interface is a Foreign Corporation whose principle address is 4620 Woodland Corporate Blvd, Tampa, FL 33614. Whose registered agent for service process is CSC Lawyers Incorporating Service whose address is 211 E. 7th Street, Suite 620, Austin, TX, 78701-3218, USA

12.

The Defendant Sage Green is an employee of Hunter Warfield primarily collecting residential rent debt. The Defendant Sage Green is an Employee who can be served at the principle address of 4620 Woodland Corporate Blvd, Tampa, FL 33614.

13.

The Defendant EXPERIAN INFORMATION SOLUTIONS INC Information Solutions, Inc. is a foreign for profit corporation who specializes in the collection and distribution of credit data. Whose American Headquarters is located at 475 Anton Boulevard, Costa Mesa CA 92626. EXPERIAN INFORMATION SOLUTIONS INC registered agent for service process is C T Corporation system located at 289 Culver St. Lawrenceville, GA 30046

14.

The Defendant Trans Union LLC is a credit data collecting and distribution company whose principle place of business is 555 W Adams St, Chicago, IL 60661. The register agent for Trans Union LLC is Corporation Services Company whose address is 2 Sun Court Suite 400 Peachtree Corners, GA 30092

15.

The Defendant Equifax Credit Information Services Inc. is a credit data collecting and distribution company whose principle place of business is 1550 Peachtree St NE Atlanta, GA 30309. The registered agent for Equifax Credit Information Credit Information Credit Information Services is Kent E Mast whose address is 1550 Peachtree St NW Atlanta, GA 30309

16.

On or around, between 7/26/21 and 7/31/21 The plaintiff Chloe Richardson Hammed signed a rental agreement and moved into an apartment unit located at 10107 Cobalt Way Stockbridge, GA 30281. After being informed that the original unit secured and paid for was no longer available due to a clerical error.

17.

O.C.G.A. Sections 44 - 7 - 13 et seq. Implied warranty of habitability

The plaintiff had complained to the property management of the following:

Disturbing nonstop running water coming from the commode. Bath tub shower would not drain and therefore clean showers were impossible to take as the water was regurgitated from the drain causing the feet to remain in filth. Fecal infested toilet water overflowed, after toilet tank consistent and disturbingly ran for days which management was made aware of. The home was unsanitary and unlivable. 9/8/23 while the unit was unoccupied the water heater or water facilitating component overflowed causing the home to become unlivable and further damaging objects in the home.

The air ducts of 2309 were filled with unreasonably large blocks of ice which caused the ventilation system to never achieve the appropriate temperature.

Within less than 14 days of officially moving into the unit the commode overflowed causing damage to the plaintiff's property totaling approximately \$24,311 due to drainage issues sewage water encompassed 75% of the apartment.

18.

O.C.G.A. Sections 51 - 1 - 2 et seq. Ordinary Negligence (Upon walking through the unit there were apparently sticky gum like substances on the floor and sticky black removable residue in the dryer. There were apparent plumbing issues that involved the bathtub, water heater and toilet. There was evidence of consistent flooding in the bathroom due to the bubbled water damaged wooden bathroom sink.) The tub would not release water promptly while showering due to drainage issues making it impossible to bathe in a normal manner of fashion. On September 8th the plaintiff stopped by the inhabitable apartment to find that a water facilitating component occupying the utility closet in the restroom had also overflowed creating the same disaster as the toilet did. Confirming that there was an overall piping and drainage issue which consistent with the water damaged sink in the guest bathroom.

19.

O.C.G.A. Sections 44 - 7 - 1 et seq. Violations of Landlord Tenant Laws

The plaintiff was relocated to a top floor unit as she had originally requested and was promised but due to an administrative error by the defendant Camden Development Inc. she was placed in an uninhabitable bottom floor unit which is the main subject of this complaint.

O.C.G.A Sections 16-7-21 Illegal Lockout

The plaintiff was

Relocated and illegally locked out and evicted from the newly leased top floor unit 2309. The plaintiff was thereafter demanded to sign a new agreement even after an agreement had been signed otherwise had no other option but face homelessness.

O.C.G.A. Sections 44 - 7 - 50 et seq. Illegal Eviction

Defendant failed to lawfully demand possession of the unit, illegally locked out the tenant, and forced a new agreement to be signed under duress of an inevitable threat of homelessness.

O.C.G.A Sections 13-5-6 et seq. Duress

Plaintiff was illegally evicted and locked out of her unit and forced to sign a new lease for the same unit before re-access. The lease previously signed was sufficiently signed. The plaintiff faced a threat of homelessness if the contract for the replacement unit number 2309 was not signed for a second time after being illegally locked out of her leased apartment.

21.

December 14, 2021 Camden Stockbridge DBA Camden Summit Partnership LP DBA Camden Stockbridge received a judgment in the amount of \$3,137.03.

22.

Camden Summit Partnership LP DBA Camden Stockbridge sent the delinquent account to collections to be collected by defendant Hunter Warfield Inc.

23.

Hunter Warfield Inc. Reported the delinquent account to defendants Experian Information Solutions, Trans Union LLC and Equifax Credit Information services in the amount of approximately 6,745.00. Reporting this erroneous amount is a violation of the Fair Credit Reporting Act per this Act only accurate credit information is to be reported to the credit bureaus for data distribution.

24.

The plaintiff has contacted EXPERIAN INFORMATION SOLUTIONS on multiple occasions and advised them that the amount reported is incorrect and have demanded that this erroneous information be removed from the credit report until the amount can be validated. They were also advised that there is a judgment in order and the amount being reported is not valid according to the judgment. The Defendant continuously and consistently distributed this incorrect data causing adverse credit decisions to be made by potential new creditors. According to this defendant they have contacted Hunter Warfield and notified them of the basis of the dispute and they were advised that the debt is v

25.

The plaintiff has contacted Equifax Credit Information Services on multiple occasions and advised them that the amount reported is incorrect and have demanded that this erroneous information be removed from the credit report until the amount can be validated. They were also advised that there is a judgment in order and the amount being reported is not valid according to the judgment. The Defendant continuously and consistently distributed this incorrect data causing adverse credit decisions to be made by potential new creditors.

26.

The plaintiff has contacted Trans Union LLC on multiple occasions and advised them that the amount reported is incorrect and have demanded that this erroneous information be removed from the credit report until the amount can be validated. They were also advised that there is a judgment in order and the amount being reported is not valid according to the judgment. The Defendant continuously and consistently distributed this incorrect data causing adverse credit decisions to be made by potential new creditors.

27.

Section § 806 F.D.C.P.A

Hunter Warfield Inc. was contacted on 7/19/23 in an effort to obtain their correct address to send inquiries concerns and complaints related to the disputed debt. A Hunter Warfield Agent by the name of Sage Green was asked to provide an address to send a complaint related to a disputed debt. Sage Confirmed the plaintiffs name as Chloe Richardson Hammed the plaintiff agreed that this was her name and Sage then demanded that the plaintiff literally recite her name for no logical or reasonable purpose other than to abuse her authority. The plaintiff advised that she has confirmed that the name stated and pronounced is her own and doesn't understand why she would be commanded to verbally recite her name if the debt collector has already verbally stated it and it has been confirmed. Sage then threatened to hang up in the plaintiffs face if she didn't verbally state her name. The plaintiff then asked for management or leadership and as a result Sage Green immediately disconnected the call in Ms. Hammed face in violation of Section § 806 of the Fair Debt Collection Practices Act and triggering anxiety within Ms., Hammed.

28.

As a direct and proximate result of the Defendants' negligence, Plaintiff CHLOE RICHARDSON has suffered and is presently suffering the following:

- (a) Loss of personal property valued at \$24,311
- (b) Mental anguish and anxiety
- (c) Foot/ Toe Fungus

(d) Adverse credit circumstances

(e) Low credit Rating

29.

By reason of the foregoing, Plaintiff CHLOE RICHARDSON is entitled to recover from Defendants compensatory and other damages in such amounts as may be shown by the evidence at trial and determined in the enlightened conscience of the jury.

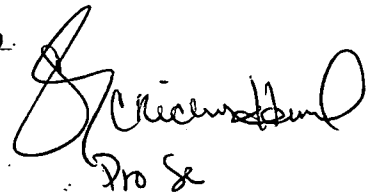
30.

WHEREFORE, CHLOE RICHARDSON prays and respectfully demands verdict and judgment as follows:

- (a) That Summons and Process issue and that the named Defendants be served with a copy of this Complaint and that Defendants be required to appear and answer;
- (b) That Plaintiff be awarded compensatory damages against Defendants, in such an amount as may be shown by the evidence and as may be determined in the enlightened conscience of the jury;
- (c) That Plaintiff be awarded special damages in an amount as may be shown by the evidence and proven at trial;
- (d) That Defendants be charged with all Court costs attributable to this action and such other costs reasonably incurred in the prosecution and trial of this case;
- (e) That Plaintiff be granted a trial by jury; and,
- (f) That Plaintiff be granted such other and further relief as may be shown by the evidence and the law, and as this Court may deem just and appropriate.

THIS 2nd DAY OF August, 2023

3695 Cumberland Blvd
Atlanta, GA 30339


Pro Se

GWINNETT COUNTY SUPERIOR
COURT STATE OF GEORGIA

CHLOE RICHARDSON HAMMED

Plaintiff,

JURY TRIAL DEMANDED

vs.

CASE NO. 23-A-06514-6

CAMDEN DEVELOPMENT INC
CAMDEN PROPERTY AND TRUST
HUNTER WARFIELD
EXPERIAN INFORMATION SOLUTIONS
EQUIFAX CREDIT INFORMATION-
SERVICES INC.
TRANSUNION LLC
SAGE GREEN

Defendants.

Demand

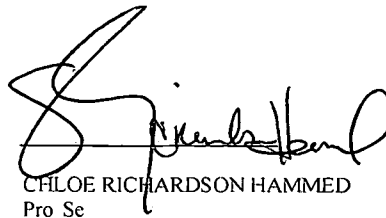
TO THE ABOVE-NAMED DEFENDANTS:

You are hereby demanded to pay for the following damages in a total sum of \$96,311.00 this sum includes the following:

Actual Damages

- \$24,311.00 for property damage
- \$10,000.00 Equifax Credit Information Reporting Violation
- \$10,000.00 EXPERIAN INFORMATION SOLUTIONS Credit Reporting Violation
- \$10,000.00 Trans Union LLC Credit Reporting Violation
- \$10,000.00 Hunter Warfield Credit Reporting Violation
- \$10,000.00 Hunter Warfield F.D.C.P.A violation (attempting to collect inaccurate debt amount)
- \$10,000.00 Sage Green F.D.C.P.A Violation (Oppressive and harassing debt collection practices)
- \$10,000.00 Mental anguish and emotional distress
- \$2,000 Medical bill

Total for demand for damages \$96,311.00


CHLOE RICHARDSON HAMMED
Pro Se

3695 Cumberland Blvd 2313
Atlanta, Georgia 30339
678-830-6808



PROCESS SERVER DELIVERY DETAILS

Date: Wed, Aug 30, 2023
Server Name: Drop Service

Entity Served	Experian Information Solutions Inc
Case Number	23a065146
Jurisdiction	GA

Inserts		



Civil Action No. 23-17-00000-11-6
 Date Filed 9/12/23

Magistrate Court ☐
 Superior Court ☒
 State Court ☐
 Georgia, Gwinnett County

John R. Hummel

Attorney's Address

Plaintiff

VS.

Exp. Inc. v. J. Hummel

Name and Address of party to be served.

Exp. Inc.
1000 Peachtree St. NE
Atlanta, GA 30309

Defendant

Garnishee

Sheriff's Entry Of Service

Personal ☐

I have this day served the defendant _____ personally with a copy of the within action and summons.

Notorious ☐

I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.

Delivered same into hands of _____ described as follows
 age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches; domiciled at the residence of defendant.

Corporation ☐

Served the defendant _____ a corporation
 by leaving a copy of the within action and summons with _____
 in charge of the office and place of doing business of said Corporation in this County.

Tack & Mail ☐

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

Non Est ☐

Diligent search made and defendant _____
 not to be found in the jurisdiction of this Court.

This _____ day of _____, 20____.

Deputy

Sheriff Docket _____ Page _____

Gwinnett County, Georgia

WHITE: Clerk

CANARY: Plaintiff / Attorney

PINK: Defendant

GWINNETT COUNTY SUPERIOR COURT
STATE OF GEORGIA

CHLOE RICHARDSON HAMMED

Plaintiff,

JURY TRIAL DEMANDED

vs.

23-A-06514-6

EXPERIAN INFORMATION SOLUTIONS INC.

Defendant.

SUMMONS

TO THE ABOVE-NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff, whose name and address is:

CHLOE RICHARDSON HAMMED

3695 Cumberland Blvd 2313
Atlanta, Georgia 30339
678-830-6808

an Answer to the Complaint which is herewith served upon you, within 30 days after service of this Summons upon you exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in this Complaint.

31st day of July, 2023

This _____ day of _____
Tiana P. Garner

Clerk of superior Court

By: 

Deputy Clerk

GWINNETT COUNTY SUPERIOR COURT

8/18/2023 9:24 AM
TIANA P. GARNER, CLERKGWINNETT COUNTY SUPERIOR
COURT STATE OF GEORGIA

CHLOE RICHARDSON HAMMED

Plaintiff,

JURY TRIAL DEMANDED

23-A-06514-6

vs.

CASE NO. _____

CAMDEN DEVELOPMENT INC

CAMDEN PROPERTY AND TRUST

HUNTER WARFIELD

EXPERIAN INFORMATION -

SOLUTIONS INC

EQUIFAX CREDIT-

INFORMATION SERVICES

TRANSUNION LLC

SAGE GREEN

Defendants

Amended
COMPLAINT FOR DAMAGES

COMES NOW CHLOE RICHARDSON HAMMED Plaintiff in the above-styled action, and
brings this Complaint for Damages, and shows the Court the following:

1.

CHLOE RICHARDSON HAMMED is, and at all times material to this action, was a resident of the State of Georgia.

2.

Defendant CAMDEN DEVELOPMENT INC. is subject to the jurisdiction and venue of this Court.

3.

Defendant CAMDEN PROPERTY TRUST is subject to the jurisdiction and venue of this Court.

Defendant EXPERIAN INFORMATION SOLUTIONS is subject to the jurisdiction and venue of this Court.

5.

Defendant Equifax Credit Information Services Inc. is subject to the jurisdiction and venue of this Court.

6.

Defendant Transunion is subject to the jurisdiction and venue of this Court.

7.

Defendant Hunter Warfield is subject to the jurisdiction and venue of this Court as of it conducts business with organizations and consumers regularly within in the State of Georgia.

8.

Defendant Sage Green is subject to the jurisdiction and venue of this Court as she conducts business with organizations and consumers regularly within in the State of Georgia on behalf of her employer Hunter Warfield.

9.

Defendant CAMDEN PROPERTY TRUST is a foreign corporation who is structured as a Real Estate Investment Trust (REIT), the company is primarily engaged in the ownership, management, development, redevelopment, acquisition, and construction of multifamily apartment communities according to their website. Their Corporate Headquarters is established in the state of Texas. CAMDEN PROPERTY TRUST principle place of business is 11 E Greenway Suite 2400, Houston, TX 77046. CAMDEN PROPERTY TRUST registered agent for service process is Capitol Corporate Services Inc. whose address is 3675 Crestwood Pkwy Suite 350 Duluth, GA 30096.

10.

The Defendant CAMDEN DEVELOPMENT INC is a foreign corporation who according to web sources provides real estate services. The Company offers property management, development, acquisitions, and construction management services. Camden Development operates in the United States. CAMDEN DEVELOPMENT INC. principle business address is 3 E GREENWAY PLZ STE 1300 HOUSTON TX 77046-0391.

AUSTIN, TX, 78746, USA

11.

The Defendant Hunter Warfield AKA Resident Interface is a collections agency primarily collecting residential rent debt. The Defendant Hunter Warfield AKA Resident Interface is a Foreign Corporation whose principle address is 4620 Woodland Corporate Blvd, Tampa, FL 33614. Whose registered agent for service process is CSC Lawyers Incorporating Service whose address is 211 E. 7th Street, Suite 620, Austin, TX, 78701-3218, USA

12.

The Defendant Sage Green is an employee of Hunter Warfield primarily collecting residential rent debt. The Defendant Sage Green is an Employee who can be served at the principle address of 4620 Woodland Corporate Blvd, Tampa, FL 33614.

13.

The Defendant EXPERIAN INFORMATION SOLUTIONS INC Information Solutions, Inc. is a foreign for profit corporation who specializes in the collection and distribution of credit data. Whose American Headquarters is located at 475 Anton Boulevard, Costa Mesa CA 92626. EXPERIAN INFORMATION SOLUTIONS INC registered agent for service process is C T Corporation system located at 289 Culver St. Lawrenceville, GA 30046

14.

The Defendant Trans Union LLC is a credit data collecting and distribution company whose principle place of business is 555 W Adams St, Chicago, IL 60661. The register agent for Trans Union LLC is Corporation Services Company whose address is 2 Sun Court Suite 400 Peachtree Corners, GA 30092

15.

The Defendant Equifax Credit Information Services Inc. is a credit data collecting and distribution company whose principle place of business is 1550 Peachtree St NE Atlanta, GA 30309. The registered agent for Equifax Credit Information Services Inc. is CT Corporation. whose address is 289 Culver St. S Lawrenceville, GA 300460

16.

On or around, between 7/26/21 and 7/31/21 The plaintiff Chloe Richardson Hammed signed a rental agreement and moved into an apartment unit located at 10107 Cobalt Way Stockbridge, GA 30281. After being informed that the original unit secured and paid for was no longer available due to a clerical error.

17.

O.C.G.A. Sections 44 - 7 - 13 et seq. Implied warranty of habitability

The plaintiff had complained to the property management of the following:

Disturbing nonstop running water coming from the commode. Bath tub shower would not drain and therefore clean showers were impossible to take as the water was regurgitated from the drain causing the feet to remain in filth. Fecal infested toilet water overflowed, after toilet tank consistent and disturbingly ran for days which management was made aware of. The home was unsanitary and unlivable. 9/8/23 while the unit was unoccupied the water heater or water facilitating component overflowed causing the home to become unlivable and further damaging objects in the home.

The air ducts of 2309 were filled with unreasonably large blocks of ice which caused the ventilation system to never achieve the appropriate temperature.

Within less than 14 days of officially moving into the unit the commode overflowed causing damage to the plaintiff's property totaling approximately \$24,311 due to drainage issues sewage water encompassed 75% of the apartment.

18.

O.C.G.A. Sections 51 - 1 - 2 et seq. Ordinary Negligence (Upon walking through the unit there were apparently sticky gum like substances on the floor and sticky black removable residue in the dryer. There were apparent plumbing issues that involved the bathtub, water heater and toilet. There was evidence of consistent flooding in the bathroom due to the bubbled water damaged wooden bathroom sink.) The tub would not release water promptly while showering due to drainage issues making it impossible to bathe in a normal manner of fashion. On September 8th the plaintiff stopped by the inhabitable apartment to find that a water facilitating component occupying the utility closet in the restroom had also overflowed creating the same disaster as the toilet did. Confirming that there was an overall piping and drainage issue which consistent with the water damaged sink in the guest bathroom.

19.

O.C.G.A. Sections 44 - 7 - 1 et seq. Violations of Landlord Tenant Laws

The plaintiff was relocated to a top floor unit as she had originally requested and was promised but due to an administrative error by the defendant Camden Development Inc. she was placed in an uninhabitable bottom floor unit which is the main subject of this complaint.

O.C.G.A Sections 16-7-21 Illegal Lockout

20.

The plaintiff was

Relocated and illegally locked out and evicted from the newly leased top floor unit 2309. The plaintiff was thereafter demanded to sign a new agreement even after an agreement had been signed otherwise had no other option but face homelessness.

O.C.G.A. Sections 44 - 7 - 50 et seq. Illegal Eviction

Defendant failed to lawfully demand possession of the unit, illegally locked out the tenant, and forced a new agreement to be signed under duress of an inevitable threat of homelessness.

O.C.G.A Sections 13-5-6 et seq. Duress

Plaintiff was illegally evicted and locked out of her unit and forced to sign a new lease for the same unit before re-access. The lease previously signed was sufficiently signed. The plaintiff faced a threat of homelessness if the contract for the replacement unit number 2309 was not signed for a second time after being illegally locked out of her leased apartment.

21.

December 14, 2021 Camden Stockbridge DBA Camden Summit Partnership LP DBA Camden Stockbridge received a judgment in the amount of \$3,137.03.

22.

Camden Summit Partnership LP DBA Camden Stockbridge sent the delinquent account to collections to be collected by defendant Hunter Warfield Inc.

23.

Hunter Warfield Inc. Reported the delinquent account to defendants Experian Information Solutions, Trans Union LLC and Equifax Credit Information services in the amount of approximately 6,745.00. Reporting this erroneous amount is a violation of the Fair Credit Reporting Act per this Act only accurate credit information is to be reported to the credit bureaus for data distribution.

24.

The plaintiff has contacted EXPERIAN INFORMATION SOLUTIONS on multiple occasions and advised them that the amount reported is incorrect and have demanded that this erroneous information be removed from the credit report until the amount can be validated. They were also advised that there is a judgment in order and the amount being reported is not valid according to the judgment. The Defendant continuously and consistently distributed this incorrect data causing adverse credit decisions to be made by potential new creditors. According to this defendant they have contacted Hunter Warfield and notified them of the basis of the dispute and they were advised that the debt is v

25.

The plaintiff has contacted Equifax Credit Information Services on multiple occasions and advised them that the amount reported is incorrect and have demanded that this erroneous information be removed from the credit report until the amount can be validated. They were also advised that there is a judgment in order and the amount being reported is not valid according to the judgment. The Defendant continuously and consistently distributed this incorrect data causing adverse credit decisions to be made by potential new creditors.

26.

The plaintiff has contacted Trans Union LLC on multiple occasions and advised them that the amount reported is incorrect and have demanded that this erroneous information be removed from the credit report until the amount can be validated. They were also advised that there is a judgment in order and the amount being reported is not valid according to the judgment. The Defendant continuously and consistently distributed this incorrect data causing adverse credit decisions to be made by potential new creditors.

27.

Section § 806 F.D.C.P.A

Hunter Warfield Inc. was contacted on 7/19/23 in an effort to obtain their correct address to send inquiries concerns and complaints related to the disputed debt. A Hunter Warfield Agent by the name of Sage Green was asked to provide an address to send a complaint related to a disputed debt. Sage Confirmed the plaintiffs name as Chloe Richardson Hammed the plaintiff agreed that this was her name and Sage then demanded that the plaintiff literally recite her name for no logical or reasonable purpose other than to abuse her authority. The plaintiff advised that she has confirmed that the name stated and pronounced is her own and doesn't understand why she would be commanded to verbally recite her name if the debt collector has already verbally stated it and it has been confirmed. Sage then threatened to hang up in the plaintiffs face if she didn't verbally state her name. The plaintiff then asked for management or leadership and as a result Sage Green immediately disconnected the call in Ms. Hammed face in violation of Section § 806 of the Fair Debt Collection Practices Act and triggering anxiety within Ms., Hammed:

28.

As a direct and proximate result of the Defendants' negligence, Plaintiff CHLOE RICHARDSON has suffered and is presently suffering the following:

- (a) Loss of personal property valued at \$24,311
- (b) Mental anguish and anxiety
- (c) Foot/ Toe Fungus

(d) Adverse credit circumstances

(e) Low credit Rating

29.

By reason of the foregoing, Plaintiff CHLOE RICHARDSON is entitled to recover from Defendants compensatory and other damages in such amounts as may be shown by the evidence at trial and determined in the enlightened conscience of the jury.

30.

WHEREFORE, CHLOE RICHARDSON prays and respectfully demands verdict and judgment as follows:

- (a) That Summons and Process issue and that the named Defendants be served with a copy of this Complaint and that Defendants be required to appear and answer;
- (b) That Plaintiff be awarded compensatory damages against Defendants, in such an amount as may be shown by the evidence and as may be determined in the enlightened conscience of the jury;
- (c) That Plaintiff be awarded special damages in an amount as may be shown by the evidence and proven at trial;
- (d) That Defendants be charged with all Court costs attributable to this action and such other costs reasonably incurred in the prosecution and trial of this case;
- (e) That Plaintiff be granted a trial by jury; and,
- (f) That Plaintiff be granted such other and further relief as may be shown by the evidence and the law, and as this Court may deem just and appropriate.

THIS 31st DAY OF July, 2023.

Clerk of superior Court



Chloe R. Hammed Pro Se

3695 Cumberland Blvd 2313
Atlanta, GA 30339
678-830-6808

GWINNETT COUNTY SUPERIOR
COURT STATE OF GEORGIA

CHLOE RICHARDSON HAMMED

Plaintiff,

JURY TRIAL DEMANDED

VS.

CASE NO. _____

CAMDEN DEVELOPMENT INC
CAMDEN PROPERTY AND TRUST
HUNTER WARFIELD
EXPERIAN INFORMATION SOLUTIONS
EQUIFAX CREDIT INFORMATION-
SERVICES INC.
TRANSUNION LLC
SAGE GREEN

Defendants

Demand

TO THE ABOVE-NAMED DEFENDANTS:

You are hereby demanded to pay for the following damages in a total sum of \$96,311.00 this sum includes the following:


Actual Damages

- \$24,311.00 for property damage
- \$10,000.00 Equifax Credit Information Reporting Violation
- \$10,000.00 EXPERIAN INFORMATION SOLUTIONS Credit Reporting Violation
- \$10,000.00 Trans Union LLC Credit Reporting Violation
- \$10,000.00 Hunter Warfield Credit Reporting Violation.
- \$10,000.00 Hunter Warfield F.D.C.P.A violation (attempting to collect inaccurate debt amount)
- \$10,000.00 Sage Green F.D.C.P.A Violation (Oppressive and harassing debt collection practices)
- \$10,000.00 Mental anguish and emotional distress
- \$2,000 Medical bill

Total for demand for damages \$96,311.00

This 31st day of July 2023

Clerk of superior Court


Chloe R. Hamed Pro Se

Civil Action No. 23-A-06514-6

Date Filed _____

Magistrate Court ☐
Superior Court ☐
State Court ☐

Georgia, Gwinnett County

Onoe Richardson. Hammer

Attorney's Address _____

Name and Address of party to be served.

Transunion LLC
2 SunCourt Suite 400
Peachtree Corners, GA 30092

2023 AUG 15 11:4:07
RECEIVED
CIVIL
G.C.S.D.
Plaintiff
vs.
Transunion LLC
Defendant

Sheriff's Entry Of Service

Personal ☐

I have this day served the defendant _____ personally with a copy of the within action and summons.

Notorious ☐

I have this day served the defendant _____ a copy of the action and summons at his most notorious place of abode in this County.
Delivered same into hands of _____ described as follows
age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches; domiciled at the residence of defendant.

Corporation ☒

Served the defendant Transunion LLC a corporation
by leaving a copy of the within action and summons with Alicia Smith
in charge of the office and place of doing business of said Corporation in this County.

Tack & Mail ☐

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

Non Est ☐

Diligent search made and defendant _____
not to be found in the jurisdiction of this Court.

This 17 day of Aug, 2023

J. Williams
Deputy

Sheriff Docket _____ Page _____

50139

Gwinnett County, Georgia

Gwinnett County Sheriff's Office

Cover Sheet



Sheriff #: 23026143



Person Served: TRANSUNION LLC
2 SUN COURT, SUITE 400
PEACHTREE CORNERS GA 30092
PHONE:

Process Information:

Date Received: 08/15/2023

Assigned Zone: 2 Sun Court

Court Case #: 23-A-06514-6

Expiration Date:

Hearing Date:

Paper Types: COMPLAINT FOR DAMAGES

Notes/Alerts:

Notes:
